

1 CLARK COUNTY SCHOOL DISTRICT
OFFICE OF THE GENERAL COUNSEL
2 S. SCOTT GREENBERG, ESQ.
Nevada Bar No. 4622
3 5100 W. Sahara Ave.
Las Vegas, Nevada 89146
4 (702) 799-5373
Attorney for Defendants
5

6 UNITED STATES DISTRICT COURT

7 DISTRICT OF NEVADA

8 ANDRE BATISTE,

9 Plaintiff,

10 v.

11 CLARK COUNTY SCHOOL DISTRICT;
12 JON HOWARD, an individual; DOES
I-X, inclusive, and ROE
13 ENTITIES I-X, inclusive,

14 Defendants.

CASE NO. 2:17-cv-00227-APG-GWF

**STIPULATION TO EXTEND MOTION
DEADLINE**

(Second Request)

15 COME NOW, the parties, by and through their attorneys of
16 record, and hereby stipulate and agree to extend the motion deadline
17 thirty (30) days from the current deadline of March 14, 2018, up to
18 and including April 13, 2018. This is the second request to extend
19 the motion deadline. This request is made in good faith for the
20 reasons described below and not for any reason of delay.

21 The parties completed depositions during the last week of the
22 discovery period and have been waiting for transcripts from said
23 depositions. There was a mis-communication with the court
24 reporter's office delaying receipt of Plaintiff's deposition
25 transcript and it is believed the transcript will be available on
26 March 9, 2018. Defendant Howard is retired from the District and
27 it has also taken longer than anticipated to obtain necessary input
28 from him for defendants' dispositive motion. Furthermore, defense

1 counsel has been working on other litigation matter deadlines
2 including a proposed pre-trial order in Case Case No. 2:15-cv-00793-
3 APG-GWF and a Nevada Supreme Court opening brief due March 20, 2018,
4 in Nevada Supreme Court Case No. 73348. Additionally, counsel have
5 had positive settlement discussions which they reasonably believe
6 may resolve the matter without the necessity of filing dispositive
7 motions.

8 Therefore, the parties respectfully request that the motion
9 deadline be extended thirty (30) days up to and including April 13,
10 2018.

11 DATED this 7th day of March, 2018.

12 CLARK COUNTY SCHOOL DISTRICT
13 Office of the General Counsel

14 By: /s/ S. Scott Greenberg
15 S. SCOTT GREENBERG
16 Nevada Bar No. 4622
17 5100 W. Sahara Ave.
18 Las Vegas, Nevada 89146
19 (702) 633-8911
20 Attorney for CCSD

By: /s/ F. Travis Buchanan
F. TRAVIS BUCHANAN
Nevada Bar No. 9371
701 E. Bridger Ave., #540
Las Vegas, NV 89101
(702) 943-0305
Attorney for Plaintiff

21 **IT IS SO ORDERED:**

22
23
24 Date: 3/8/2018


U.S. MAGISTRATE JUDGE